Robert L. Rimberg (RLR 2453) Joel S. Schneck (JSS7019) GOLDBERG RIMBERG & FRIEDLANDER, PLLC 115 Broadway, 3rd Floor New York, NY 10006 (212) 697-3250 Attorneys for Defendants Stonehedge Acquisition Rome II, LLC and Stonehedge Acquisition Chittenango II, LLC

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JANE A. HALBRITTER,

Plaintiff,

-AGAINST-

STONEHEDGE ACQUISITION ROME II LLC and STONEHEDGE ACQUISITION CHITTENANGO II, LLC,

Defendants.

07 Civ. 3848 (WHP)

NOTICE OF MOTION

PLEASE TAKE NOTICE that defendants Stonehedge Acquisition Rome II LLC and Stonehedge Acquisition Chittenango II, LLC, by their attorneys, Goldberg, Rimberg and Friedlander PLLC, will move this Court, before the Hon. William H. Pauley, U.S.D.J., at the Federal Courthouse, Southern District of New York, 500 Pearl Street, New York, NY, 10007, on February 15, 2008, for an Order pursuant to Fed. R. Civ. Proc. 12(b)(1) and 28 U.S.C. § 1359 dismissing the action herein for a lack of subject matter jurisdiction.

Dated:

New York, New York

January 4, 2008

By:

Robert L. Rimberg (RLR 2453)
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To: Allegaert Berger & Vogel LLP Attorney for Plaintiff 111 Broadway – 20th Floor New York, New York 10006